

EXHIBIT E

needs of this case. Notwithstanding the foregoing objections, the Debtors are producing three responsive documents (FWE-0047937–FWE-0047954) contemporaneously with these *Amended Responses and Objections*.

REQUEST FOR PRODUCTION NO. 18

A copy of all bid documents the Debtors received for the Credit Bid Acquired Interests and any responsive documents.

RESPONSE:

The Debtors object to this Request to the extent it requests documents beyond those sufficient to respond to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case on the basis that it seeks documents not relevant to confirmation.

REQUEST FOR PRODUCTION NO. 19

A copy of all documents/data that went into the creation of spreadsheet FWE-0000016, produced to the Sureties on March 31, 2021.

RESPONSE:

The Debtors object to this Request to the extent it requests documents beyond FWE-0000016 as overbroad, unduly burdensome, and not proportional to the needs of this case. The FWE I Model (FWE-0000016) contains substantial detail on how the estimates and projections were formulated, including field level LOE costs and field level production forecasts with a decline from the MY'20 reserve report (also provided).

REQUEST FOR PRODUCTION NO. 20

A copy of all documents reflecting communications between the Debtors and any governmental entity regarding new bonding/financial assurance for FWE I, FWE III, FWE IV or Credit Bid Purchaser.